

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION

UNITED STATES OF AMERICA,)	
)	No. _____
Plaintiff,)	
)	18 U.S.C. § 666(a)(1)(A)
v.)	NMT 10 Years Imprisonment
)	\$250,000 Fine
RONNIE G. DESHON,)	Class C Felony
[DOB: XX/XX/54],)	NMT 3 Years Supervised Release
)	\$100 Special Assessment
Defendant.)	Restitution may be ordered

I N F O R M A T I O N

THE UNITED STATES ATTORNEY CHARGES THAT:

1. At all times material herein:

A. Defendant RONNIE G. DeSHON, a resident of Gallatin, Missouri, was the superintendent of the Pattonsburg, Missouri R-II School District. He maintained a bank account at the Northwest Missouri Regional Credit Union, Maryville, Missouri.

B. The Pattonsburg, Missouri R-II School District was a public school district in the State of Missouri. It received funding from the Missouri Securities Investment Program (MOSIP) and maintained a bank account at Bethany Trust Company, hereafter BTC Bank, Pattonsburg, Missouri, formerly doing business as Guaranty Bank.

C. The Missouri Securities Investment Program, hereafter MOSIP, located in Long Island, New York, was a financial institution that funnels federal and state funds for Missouri school districts. MOSIP received federal and state

funding for school districts, then disbursed the funds to individual Missouri school districts, including the Pattonsburg School District. MOSIP transferred funds into the Pattonsburg School District's individual MOSIP bank account, which funds were used to cover operating expenses of the school district.

2. From on or about July 1, 2000, through on or about October 13, 2004, defendant RONNIE G. DESHON was the superintendent of schools for the Pattonsburg, Missouri R-II School District.

3. At all times material herein, defendant was an agent of the Pattonsburg, Missouri R-II School District within the meaning of Title 18, United States Code, Section 666(d)(1).

4. At all times material herein, defendant's duties as superintendent of schools included insuring that MOSIP funds were transferred to the account of the Pattonsburg, Missouri R-II School District.

5. During each of the calendar years 2000 through 2004, the Pattonsburg, Missouri R-II School District received federal funds each year was in excess of \$10,000 under a Federal program involving a grant, subsidy and other forms of Federal assistance, as follows:

<u>School Year</u>	<u>Federal Funds Received</u>
2000-2001	\$155,165.93
2001-2002	\$162,306.33
2002-2003	\$115,195.48
2003-2004	\$208,306.68

6. Between on or about September 6, 2000, and on or about October 13, 2004, at Pattonsburg and Marysville, in the Western District of Missouri, and elsewhere, defendant RONNIE G. DESHON did embezzle, steal, and otherwise without authority knowingly convert to his own use and that of others not the rightful owner, and did intentionally misapply, funds in excess of \$5,000, that is, in the approximate sum of \$844,477.52, which funds were owned by and under the care, custody, and control of MOSIP and the Pattonsburg, Missouri R-II School District, constituting funds for the operation of the Pattonsburg, Missouri R-II School District, which receipts it was the duty of defendant to utilize for the school district.

All of the foregoing is in violation of Title 18, United States Code, Section 666(a)(1)(A).

Todd P. Graves
United States Attorney

by */s/ Linda Parker Marshall*

Linda Parker Marshall #24954
Assistant United States Attorney

Dated: March 8, 2005